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Michel Masson  
CEO  
Infrastructure Victoria  
Level 33, 140 William Street  
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13 December 2019

Doc No: D19-674394  
Our Ref: -  
Your Ref: -

Dear Michel

**Submission to Infrastructure Victoria – Recycling Evidence Base Report**

Thank you for the opportunity to provide feedback on Infrastructure Victoria's interim report on recycling and resource recovery infrastructure.

The City welcomes the key early findings and potential actions as identified in this report. With the City's operational experience built over years in the waste industry, we have shared our knowledge and lessons learnt in our response.

We look forward to Infrastructure Victoria's final recommendations in 2020, and welcome opportunities to collaborate with the Victorian Government to deliver infrastructure solutions to improve Victoria's waste and recycling system. Our input is outlined in the submission attached.

The waste and recycling industry has been heavily impacted by the changes in international practice. Nevertheless this is an opportune time to reset Victoria's waste and recycling system and to implement sustainable infrastructure solutions to support waste avoidance and resource recovery.

Should you have any questions in relation to this submission, please do not hesitate to contact Rodney Thomas, Manager Environment and Waste Services on 5272 4806 or email [rthomas@geelongcity.vic.gov.au](mailto:rthomas@geelongcity.vic.gov.au) to further discuss.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Martin Cutter", with a long horizontal flourish extending to the right.

**MARTIN CUTTER**  
CHIEF EXECUTIVE OFFICER

## **SUBMISSION FROM THE CITY OF GREATER GEELONG TO INFRASTRUCTURE VICTORIA – RECYCLING AND RESOURCE RECOVERY INFRASTRUCTURE EVIDENCE BASED REPORT**

The City welcomes the key early findings and potential actions as identified in the Interim Report. We support the potential sector-wide interventions highlighted and look forward to the final recommendations to be released in 2020.

We particularly support the following findings:

- The urgent need for an overarching Victorian Circular Economy Policy.
- Support and advice to assist greater separation of waste in homes and businesses.
- State Government's support (e.g. policy and investment) to better establish viable end markets for glass, plastic and paper.
- State Government's support and advice to ensure a consistent approach to food and garden organics (FOGO).
- Legislation and procurement policy to ensure the use of recycled materials in Victorian industries such as manufacturing, construction and agriculture.
- Strategic advice on how Victoria should transition towards a Circular Economy with due consideration of international best practice.
- Industry incentives for improved product design, provision of infrastructure and new pathways for recyclable materials.
- Industry incentives (rather than penalties for not meeting targets) to increase recovery and diversion rates.

We hope that the final recommendations will give greater consideration to the feedback from Infrastructure Victoria's regional workshops held earlier this year. The City's representative attended the Ballarat regional workshop. There were two key priorities identified at this workshop that we don't believe have been given sufficient priority in the interim report.

- **State Container Deposit Scheme (CDS)** – The industry urgently needs the State Government to take the lead. The comment in the Interim Report that "CDS has promise but needs more analysis" is significantly understated and does not reflect the overwhelming feedback from local government, regional waste management groups and the Municipal Association of Victoria (MAV). The State Government should be following the leadership shown by the New Zealand Government and the majority of other Australian states and introduce the CDS without further delay.
- **Future infrastructure investment** – As with the CDS there was strong support shown at the Ballarat regional workshop for a regional Material Recycling and Resource Recovery Facility (MRF). The Barwon South West Waste and Resource Recovery Group has also shown strong support for a regional MRF. Unfortunately this support appears to have been neglected in the Interim Report.

In our more detailed input below, the City has provided further suggestions to strengthen the potential actions.



## **About the City of Greater Geelong**

The City of Greater Geelong manages a broad range of waste services and infrastructure including:

- kerbside residential 3-bin collection service
- Drysdale Landfill
- hard waste collection service
- public place bins service including garbage, recycling, dog waste, cigarette butts etc
- two resource recovery centres
- garden organics composting facility
- bulk haul transfer station
- waste education programs and engagement.

Our annual 2018-19 waste and resource recovery budget was \$54.5 million to service a population of about 252,000 (109,700 tenements) and 5.2 million annual visitors.

Our kerbside recycling service relied on the operation of the sorting and processing facilities previously owned by SKM Recycling. Recyclables has been sent to landfills when the SKM facilities ceased receiving materials during the recycling crises.

## **The City's Draft Waste and Resource Recovery Strategy**

Following extensive community and stakeholder consultations, the City has prepared a draft Waste and Resource Recovery Strategy to guide our strategic directions over the next ten years. From what we heard and learnt, we put together the following Vision and Goals for the draft Strategy.

**Vision** – the City contributes to a circular economy by leading and supporting the community to actively avoid waste and increase resource recovery.

**Goal 1 – Avoid creating waste** – to reduce waste by actively avoiding it

**Goal 2 – Recovery more resources** – to value waste as a resource and recover more from it

**Goal 3 – Protect the environment** – to reduce the impact waste has on the environment.

Our Strategy will help the City of Greater Geelong community to manage waste and resource recovery in a way that minimises impacts on the environment.

It also aligns with the State's objectives for waste and resource recovery as outlined in the Infrastructure Victoria's Interim Report.

## **Question 1 – Have we identified the right outcomes for Victoria to aim for?**

We heard from our community that they want to avoid creating waste in the first place and reduce the amount of waste produced. More products can be designed to be reused and stay in a circular economy for as long as possible.

We recommend Infrastructure Victoria to increase focus on waste avoidance, reduction and reuse which is important to a circular economy.

## **Question 2 – Have we identified the most effective potential actions for government to take?**

The City supports the potential actions identified in the report and provides the following further recommendations to strengthen the potential actions.

### **1. Governance arrangements of the waste management sector**

There are multiple state government agencies involved in guiding and managing the waste sector. We encourage the Victorian Government to review the current governance arrangement in order to support the State's strategic leadership to coordinate our waste management systems.

It would be helpful to set out clear expectations on different organisations and sectors in order to respond and deliver the actions to achieve the intended outcomes.

### **2. Target setting**

We understand that the Commonwealth and Victorian Governments are keen to set waste and recycling targets to drive change and achieve the intended outcomes.

It is important to acknowledge that there are gaps in the current waste data as limited resources have been allocated to improve data quality over years.

We recommend the Victorian Government to invest in data collection and monitoring, and develop representative targets to measure outcomes and performance.

Waste diversion rate (weight of recyclables and organics collected from kerbside bins / weight of garbage, recyclables and organics collected) has been the key waste indicator in local government performance reporting. However the community's effort on waste avoidance is not being reflected by the waste diversion rate.

### **3. Land use planning**

Strategic land use planning for future waste and recycling facilities at the State Government level would be essential to support the development of infrastructure.

## **Question 3 – Which, if any, of the initiatives implemented in Wales would you like to see applied in Victoria?**

The Welsh Government has a suite of legislations, planning policies, sector plans and technical advice notes to support the implementation of their waste strategy Towards Zero Waste. They have demonstrated strong leadership by setting targets and bans, as well as supporting the waste sector with directions and technical guidance.

They have also provided their councils with significant funding to support increasing recycling. In 2016-17, Welsh councils spent at least £60 million of the £64.3 million allocated in the Single Revenue Grant.

It should be taken into consideration that Victoria is geographically ten times larger than Wales but only double their population size. Victoria's metropolitan areas are densely populated, contrasted with sparsely populated regional areas that are long distance away from the existing major waste facilities. These are the factors to consider in designing Victoria's waste collection systems with reference to the Welsh system.



**Question 4 – What do you think of the market design opportunities proposed to improve waste sector outcomes and efficiency?**

The City supports the market design opportunities proposed in the report. We also encourage more measures to diversify the markets by introducing more players and competitions. This will give businesses and organisations who make purchase and procurement decisions more options to choose and buy recycled products.

**Question 5 – Where do you think government should focus their efforts to increase recycling and resource recovery? (for example, through setting targets, promoting consistency or funding local councils?)**

Leadership and clear policy direction to drive coordinated effort across both state and local governments are essential to reduce waste and increase recycling.

The engagement and cooperation of businesses, communities and individuals is important to ensure strategies and actions are being delivered and to achieve the intended outcomes.

Without state-wide waste strategy or policy, responsible agencies are operating in an uncertain environment and cannot effectively prioritise their time and resources. Policies are important tools that drive both public and private investment.

The City is looking forward to the Victorian Government's circular economy policy, 30-year infrastructure strategy and other strategies to fill this gap.

**Question 6 – Which materials or infrastructure types present the most opportunity in your region?**

**Infrastructure needs for the Barwon South West region**

**1. Regional recovery and recycling facility**

The City of Greater Geelong was one of the councils that relied on SKM Recycling to process kerbside recyclables. We were not able to secure an alternative recycling processor due to the amount of material we collect (27,000 tonnes a year) and the travel distance from existing processing facilities.

Over 10,000 tonnes of kerbside recyclables has been sent to landfill following the closure of the SKM facilities during the recycling crises.

The volume of recyclables generated in the Barwon South West region and our distance from major recycling facilities have highlighted that there are opportunities to establish regional recycling facilities with equipment that support more advanced sorting and processing of materials collected.

**2. Food organics processing facility**

The City has not been able to introduce a food organics collection service as there is no large scale food organics processing facility available in the Greater Geelong, Barwon or Melbourne West regions.

A number of our neighbouring councils have started trialling residential kerbside FOGO collection service. The FOGO material collected is being transported to a facility 300km away in Shepparton for processing.

The State Government can assist the Barwon region by helping to establish a large scale FOGO processing facility. The City would welcome the State to support us to upgrade our existing open windrow composting facility to meet EPA requirements for processing food organics. This would provide a local FOGO processing solution to the City, the Barwon South West region, and neighbouring metropolitan councils.

### **3. Bulk haul transfer facility**

Due to the long distance from existing waste facilities in Melbourne, waste and recycling collected in the Barwon South West region requires bulk haul transport to Melbourne for processing.

Geelong is the western gateway to Melbourne and other areas of Victoria e.g. the Barwon South West region. Development of a regional waste bulk haul transfer facility that can potentially co-locate with other waste and recycling processing facilities in Geelong would be beneficial to the region.

### **4. Waste to energy**

As we move towards a circular economy and better resource recovery, some leftover waste will still remain. This might include waste that for public health and other reasons cannot be reused or recycling e.g. clinical waste and asbestos, or products that are made out of materials we have not yet been able to re-process.

Through state-wide policy and strategies, there has been a gradual reduction in the number of landfills over the past few years. However alternatives to landfilling of residual waste have not yet been developed to support this shift. Municipal landfills in the Greater Geelong region will reach their capacities in approximately 8 years.

To significantly reduce our future reliance on landfills in Victoria, we need a solution to process the waste we cannot recycle, compost or repurpose.

With the high population growth in Geelong, Surf Coast and Melbourne's Western suburbs, there is an opportunity to develop an alternative waste solution to recover energy from residual waste that cannot be recovered through any other processes.

### **Question 7 – What is a legislative barrier or enabler that you have encountered when trying to use recycled materials?**

Current regulations and specifications for building, road and water infrastructure construction do not encourage the use, or trial of products that are made from recycled materials.

There are potential risks and generally higher cost that users have to consider in procurement. In addition, there are limited choices of recycled products available in the market.

Increased support and financial incentives from the Victorian Government would support the industry to develop wider range of products from recycled materials.

The City has used recycled materials in delivering our capital works projects. This includes recycled rubber for an athletics track, concrete with steel slag, and recycled asphalt pavement. We also use recycled plastic park furniture and bollards in our open space and streetscape projects. The City would use more recycled materials/products in building and road construction if there are more products available in the market.